

IN RE: REALPAGE, INC., RENTAL) NO. 3:23-cv-03071
SOFTWARE ANTITRUST) MDL No. 3071
LITIGATION (NO. II))
) THIS DOCUMENT RELATES TO:
)
) ALL CASES

GROUNDS FOR MOTION

1. In Defendant RPM and Related's Motion to Extend the Structured Data Production Deadline filed contemporaneously with this motion, RPM and Related request an extension of the December 20, 2024 deadline under the Court's Case Management Order ("CMO") and Docket Entry 1005 modifying the original CMO.

2. The CMO originally ordered production of structured data on October 25, 2024. (Dkt. 818.) The Court entered an order extending the October 25, 2024 structured data production deadline to December 20, 2024. (*See* Dkt. 1005.) The CMO states that "[a]ny motion to modify the case management order or any case management deadline shall be filed at least seven days in advance of the earliest impacted deadline." (Dkt. 818.)

3. Defendants RPM and Related did not know full compliance with the CMO's structured data production deadline was not possible until recently. Defendants RPM and Related made every effort to fully comply with the December 20, 2024 deadline. Less than seven days before December 20, 2024, Defendants RPM and Related officially confirmed they will only be able to partially to comply with the current December 20, 2024 deadline. Therefore, Defendants RPM and Related seek leave to file a motion that, if granted, would modify the CMO less than seven days before the current December 20, 2024 deadline. Plaintiffs are unopposed RPM's and Related's request.

4. As discussed in Defendant RPM and Related's Motion to Extend the Structured Data Production Deadline, the Court has good cause to extend the December

20, 2024 deadline. Despite RPM and Related's diligent efforts, they will not be able to meet the December 20, 2024 deadline. Likewise, the Court has good cause to grant this related Motion for Leave so that the Plaintiffs can receive the complete discovery of structured data under a modified CMO.

5. As noted in Defendant RPM and Related's Motion to Extend the Structured Data Production Deadline, Defendants will produce the lion share of the structured data on the December 20, 2024 deadline and any extension of the CMO deadline will allow Defendants to produce the balance structured data not capable of being produced on or before December 20, 2024.

CONCLUSION

For the foregoing reasons Defendants RPM Living, LLC and the Related Companies, L.P. and Related Management Company L.P. respectfully request that the Court grant them leave to file a motion modifying the Court's case management deadline less than seven days in advance of the current December 20, 2024 deadline.

Dated: December 19, 2024

Respectfully submitted,

By: /s/ Troy L. Hales

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing *DEFENDANTS RPM LIVING, LLC, THE RELATED COMPANIES, L.P., AND RELATED MANAGEMENT COMPANY L.P.S' UNOPPOSED MOTION TO EXTEND THE STRUCTURED DATA PRODUCTION DEADLINE* was served electronically on the plaintiffs' counsel of record by the listserv (RealPageCoCounsel@scott-scott.com) on December 19, 2024.

By: /s/ Troy L. Hales

Troy L. Hales